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August 28, 2014

VIA ECF

The Honorable Roslynn R. Mauskopf
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

*The Judgment as filed reflects
the designation request made
by counsel at sentencing.
Further modifications of both
the designation request
and surrender
date are denied.*

Re: United States v. Christopher Finazzo
10-cr-00457 (RRM)

Dear Judge Mauskopf:

So Ordered
s/ Roslynn R. Mauskopf

We represent Mr. Christopher Finazzo. We write further to the sentencing proceedings before this Court on August 20, 2014. The Judgment was docketed on August 27, 2014, and included a recommendation that the defendant be designated to a camp near New England, New York, New Jersey or Pennsylvania. Judgment, p. 3.

*UCDJ
9/4/2014*

I write to respectfully request that the Court amend the Judgment to include a specific designation request for the prison camp at either Otisville, New York, or Schuylkill, Pennsylvania on grounds that it is important that Mr. Finazzo be designated to a facility close to his family, which lives in Nassau County, New York. Bureau of Prison policy encourages frequent family visits as part of the rehabilitation process. See, BOP Program Statement § 540.40. Both facilities are within reasonable driving distance from Nassau County.

Without the Court's specific designation, Mr. Finazzo could be sent to a camp in Western Pennsylvania, which would require the family to make a 14 hour return trip by car. That will make family visits both more difficult and less frequent. In addition, my understanding is that the BOP staff will consider specific requests from the Court and grant them if possible.

I also request that the Court amend the self surrender date to 60 days from the date the Judgment or Amended Judgment is docketed, or 48 hours from receipt of designation, whichever is sooner. The designation process does not begin until the Judgment is docketed.

Respectfully submitted,

Robert J.A. Zito
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RJAZ/ma

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